

EXHIBIT 19

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Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES,) 1:23-cv-00108-LMB-JFA
et al.,)
)
Plaintiffs,)
)
vs.)
)
GOOGLE LLC,)
)
Defendant.)
_____)

VIDEOTAPED DEPOSITION OF

LARA STOTT

September 18, 2023

9:33 a.m.

Reported by: Bonnie L. Russo

Job No. 6097869

Page 2	Page 4
1 Videotaped Deposition of Lara Stott held at:	1 APPEARANCES (CONTINUED):
2	2
3	3 Also Present:
4	4 Captain Michael Ellis, Deputy Staff Advocate,
5	5 Air Force Recruiting
6 Paul Weiss Rifkind Wharton & Garrison, LLP	6 Lieutenant Grant Wahlquist, Air Force
7 2001 K Street, N.W.	7 Commercial Law, Field Support Center
8 Washington, D.C.	8 Orson Braithwaite, Videographer
9	9
10	10 Also Present Via Remotely:
11	11 Katherine Clemons, DOJ
12	12
13	13
14	14
15	15
16	16
17	17
18 Pursuant to Notice, when were present on behalf	18
19 of the respective parties:	19
20	20
21	21
22	22
Page 3	Page 5
1 APPEARANCES:	1 I N D E X
2	2 EXAMINATION OF LARA STOTT
3 On behalf of the Plaintiffs:	3 BY MS. MILLIGAN 9
4 MARK H.M. SOSNOWSKY, ESQUIRE	4
5 RACHEL ZWOLINSKI, ESQUIRE	5 EXHIBITS
6 ALVIN CHU, ESQUIRE	6 Exhibit 118 LinkedIn Profile of 15
7 UNITED STATES DEPARTMENT OF JUSTICE	7 Lara Stott
8 450 Fifth Street, N.W.	8 Exhibit 119 E-Mail Chain 36
9 Washington, D.C. 20530	9 dated 9-14-22
10 mark.sosnowsky@usdoj.gov	10 USAF-ADS-0000860595-602
11 rachel.zwolinski@usdoj.gov	11 Exhibit 120 Article entitled 37
12 alvin.chu.liu@usdoj.gov	12 "Recruiting is hard.
13	13 these YouTubers may have
14 On behalf of the Defendant:	14 cracked the code"
15 HEATHER MILLIGAN, ESQUIRE	15 Exhibit 121 E-Mail Chain 86
16 MARTHA L. GOODMAN, ESQUIRE	16 dated 6-14-22
17 PAUL, WEISS, RIFKIND, WHARTON &	17 Attachment
18 GARRISON, LLP	18 USAF-ADS-0000861537-609
19 2001 K Street, N.W.	19 Exhibit 122 E-Mail Chain 122
20 Washington, D.C. 20006	20 dated 9-18-22
21 hmilligan@paulweiss.com	21 Attachment
22 mgoodman@paulweiss.com	22 USAF-ADS-0000001422-476

2 (Pages 2 - 5)

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973-410-4098

		Page 6		Page 8
1	EXHIBITS (CONTINUED):			
2				
3	Exhibit 123 E-Mail Chain	153	1 Counsel will now state their	
4	dated 9-19-22		2 appearances and affiliations for the record.	
5	Attachment		3 MS. MILLIGAN: Heather Milligan with	
6	USAF-ADS-0000418778-810		4 the law firm Paul, Weiss, Rifkind, Wharton &	
7	Exhibit 124 E-Mail Chain	185	5 Garrison on behalf of Google LLC.	
8	dated 12-16-22		6 MS. GOODMAN: Martha Goodman from	
9	Attachment		7 Paul Weiss on behalf of Google.	
10	USAF-ADS-0000785936-960		8 MR. SOSNOWSKY: Mark Sosnowsky with	
11	Exhibit 125 E-Mail Chain	216	9 the Department of Justice on behalf of the	
12	dated 8-2-22		10 United States and the air force.	
13	Attachment		11 MS. ZWOLINSKI: Rachel Zwolinski on	
14	USAF-ADS-0000005724-787		12 behalf of the United States.	
15			13 MR. CHU: Alvin Chu on behalf of the	
16			14 United States.	
17			15 CAPTAIN ELLIS: Captain Mike Ellis,	
18			16 air force recruiting service.	
19			17 LIEUTENANT WAHLQUIST: Lieutenant	
20			18 Grant Wahlquist, air force, commercial law	
21			19 field support center.	
22	(Exhibits bound separately.)		20 THE VIDEOGRAPHER: Thank you.	
			21 Will the court reporter please swear	
			22 in the witness.	
		Page 7		Page 9
1	PROCEEDINGS		1 LARA STOTT,	
2	(9:33 a.m.)		2 being first duly sworn, to tell the truth, the	
3			3 whole truth and nothing but the truth,	
4	THE VIDEOGRAPHER: Good morning.		4 testified as follows:	
5	We are going on the record at 9:33		5 EXAMINATION BY COUNSEL FOR DEFENDANT	
6	a.m. on September 18, 2023.		6 BY MS. MILLIGAN:	
7	Please note that the microphones are		7 Q. Hi. Nice to meet you.	
8	sensitive and may pick up whispering and		8 Could you state your name for the	
9	private conversations. Please mute your phones		9 record.	
10	at this time. Audio and video recording will		10 A. It's Lara Stott.	
11	continue to take place unless all parties agree		11 Q. Okay. And the pronunciation is	
12	to go off the record.		12 Stott?	
13	This is Media Unit 1 of the		13 A. Yes.	
14	video-recorded deposition of Ms. Lara Stott in		14 Q. Great. So my name is Heather	
15	the matter of United States, et al. versus		15 Milligan, and I'm with the law firm Paul Weiss,	
16	Google LLC filed in the United States District		16 and I represent Google.	
17	Court, Eastern District of Virginia, Alexandria		17 Have you ever been deposed before,	
18	Division, Case No. 1:23-cv-00108-LMB-JFA.		18 Ms. Stott?	
19	My name is Orson Braithwaite		19 A. No.	
20	representing Veritext Legal Solutions, and I am		20 Q. Okay. So just going to start with a	
21	the videographer. The court reporter is Bonnie		21 few rules.	
22	Russo from the firm Veritext Legal Solutions.		22 I'm going to try to break roughly	

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<p>1 MS. MILLIGAN: This is prior to 2 outreach by counsel, so --</p> <p>3 MR. SOSNOWSKY: I understand that, 4 but I'm -- well, I can still instruct her just 5 because she has already asked several questions 6 about the time line. Okay. She says when she 7 was with somebody that reached out --</p> <p>8 MS. MILLIGAN: Or you can just give 9 the -- instruct -- just give the instruction to 10 the witness.</p> <p>11 MR. SOSNOWSKY: Okay. So I'm going 12 to instruct you not to reveal privileged 13 communications or information or activities 14 that were done at the instruction of counsel 15 that came from counsel.</p> <p>16 THE WITNESS: Okay. Then, no, I 17 can't answer that question.</p> <p>18 BY MS. MILLIGAN:</p> <p>19 Q. Okay. So your only knowledge of -- 20 of the air force's involvement in this 21 litigation came from counsel or communications 22 that were done at the direction of counsel?</p>	<p>1 concerns with."</p> <p>2 My primary function is to make sure 3 that we are executing an efficient marketing 4 plan in order to achieve an end recruiting 5 mission. So insomuch as any vendor would be 6 performing or not performing, that's really 7 what I am looking at.</p> <p>8 BY MS. MILLIGAN:</p> <p>9 Q. So you did not have specific 10 concerns as to Google?</p> <p>11 MR. SOSNOWSKY: Objection to form.</p> <p>12 THE WITNESS: I don't recall any 13 specific issues or challenges or concerns with 14 respect specifically to Google. But, again, it 15 would have been as a part of a broader 16 marketing program in order to meet an end 17 recruitment mission.</p> <p>18 BY MS. MILLIGAN:</p> <p>19 Q. And earlier you said that you were 20 not worrying about the lawsuit on a day-to-day 21 basis.</p> <p>22 Are you worrying about it at all?</p>
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<p>1 That's a yes-or-no question.</p> <p>2 MR. SOSNOWSKY: Object to form.</p> <p>3 But you can answer that yes or no.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MS. MILLIGAN:</p> <p>6 Q. Prior to this lawsuit in your -- in 7 your role at the air force, were you aware of 8 any anticompetitive conduct on the part of 9 Google affecting U.S. Air Force's advertising?</p> <p>10 MR. SOSNOWSKY: Objection to form.</p> <p>11 Foundation.</p> <p>12 THE WITNESS: No, I don't believe I 13 was.</p> <p>14 BY MS. MILLIGAN:</p> <p>15 Q. Prior to this lawsuit, did you have 16 any concerns that Google was engaging in 17 anticompetitive conduct related to digital 18 advertising?</p> <p>19 MR. SOSNOWSKY: Objection to form.</p> <p>20 Foundation.</p> <p>21 THE WITNESS: Again, I just -- I 22 want to be clear when you use words like "have</p>	<p>1 MR. SOSNOWSKY: Objection to form.</p> <p>2 THE WITNESS: Am I worrying about a 3 lawsuit at all; is that what you're asking?</p> <p>4 BY MS. MILLIGAN:</p> <p>5 Q. Yeah. Yes.</p> <p>6 MR. SOSNOWSKY: Same objections.</p> <p>7 THE WITNESS: No. Again, I have 8 such a long list of things to do that this is 9 not high on that priority list.</p> <p>10 BY MS. MILLIGAN:</p> <p>11 Q. Prior to this lawsuit -- sorry. 12 Strike that.</p> <p>13 Where on the priority list is it?</p> <p>14 MR. SOSNOWSKY: Objection to form.</p> <p>15 THE WITNESS: Well down below all of 16 those other things that get us to meeting 17 mission requirements and any other special 18 projects that I get assigned to in order to 19 make things at air force recruitment service 20 marketing work better.</p> <p>21 BY MS. MILLIGAN:</p> <p>22 Q. And earlier we mentioned</p>

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